

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:

COMMAND ENERGY SERVICES
INTERNATIONAL, LTD.

Debtor.

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Case No. 20-30289

(Chapter 7)

**AFFIDAVIT OF PROPOSED COUNSEL
PURSUANT TO 11 U.S.C. § 329(A) AND BANKRUPTCY RULES 2014, 2016(B)**

McCloskey Roberson, PLLC (“MR”), proposed special litigation counsel for Randy W. Williams, chapter 7 trustee for the estate of HRD Corporation, (the “Trustee”), states that to the best of its knowledge, MR represents no interest adverse to the estate in the matters upon which this firm has been or is to be engaged; that MR’s employment has been and would be in the best interest of the estate; and that the attorneys in this firm are disinterested persons as defined under 11 U.S.C. § 101(14).

MR has represented the Trustee in prior matters including (i) Case No. 13-36238; *In re HRD Corporation*, in the United States Bankruptcy Court for the Southern District of Texas, Houston Division; and (ii) potential representation in Case No. 17-35467; *In re Mogul Energy International, Inc.*, in the United States Bankruptcy Court for the Southern District of Texas, Houston Division, and (iii) Case No. 17-35952, *In re Anloc, LLC*, in the United States Bankruptcy Court for the Southern District of Texas. MR also currently represents several other chapter 7 trustees in other active cases. MR also represented Randy Williams in his capacity as a post-confirmation trustee in Case No. 18-34245, *In re South Texas Innovations, LLC*, pending in the United States Bankruptcy Court for the Southern District of Texas.

Except as set forth herein and to the best of its knowledge, MR has no other connections with the debtor, its creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee, any person employed in the office of the United States Trustee and is a “disinterested person” within the definition of Section 101(14) of the Bankruptcy Code on the matters for which it is to be engaged as special counsel.

Legal representation undertaken by MR includes (a) assisting the Trustee in analyzing claims owned by the estate; (b) preparing and filing such pleadings as are necessary to pursue the estate’s claims and defend the Trustee; (c) conducting appropriate examinations of witnesses, claimants and other parties in interest in connection with contemplated litigation; (d) representing the Trustee in any adversary proceedings and other proceedings before the Court and in any other judicial or administrative proceeding in which the claims described in the Application to Employ may be affected; (e) collecting any judgment that may be entered in the contemplated litigation; (f) handling any appeals that may result from the contemplated

litigation; and (g) performing any other legal services that may be appropriate in connection with the prosecution of the litigation described in the Application to Employ.

MR has agreed to the contingency fee arrangement as set forth in the application and Exhibit 1 to the application. The agreement is the product of free and arms-length discussions. To date, MR has not received any funds from the debtor, the estate or the Trustee in connection with the proposed representation in this case.

For any compensation received by MR, MR has not promised, either directly or indirectly to share any such compensation with any other persons nor does MR have any agreement for the payment of attorney's fees and expenses expect as stated herein.

DATED: August 13, 2020.

MCCLOSKEY ROBERSON, PLLC

By: Thomas A. Woolley, III
Thomas A. Woolley, III
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THE STATE OF TEXAS §
§
COUNTY OF HARRIS §

SWORN TO AND SUBSCRIBED BEFORE ME, a notary public in the State of Texas, County of Harris, on this the 13th day of August 2020 by Thomas A. Woolley, III, to certify which, witness my hand and seal of office.

Estela R. Gonzalez
Notary Public in and for
The State of T E X A S

